

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492
Case No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Brown

**MEDICAL MONITORING PLAINTIFFS' SECOND AGREED MOTION
FOR EXTENSION OF DATES SET IN CASE MANAGEMENT ORDER NO. 1, AS
AMENDED**

All Plaintiffs transferred to this Court by the Judicial Panel on Multi-District Litigation ("Medical Monitoring Plaintiffs"),¹ by and through their attorneys, respectfully request a 45-day extension of the dates set forth in Case Management Order No. 1, as amended by this Court's February 20, 2014 Order. Medical Monitoring Plaintiffs further request that the April 24, 2014 hearing date be stricken, and that a new hearing date be scheduled for a date after May 20, 2014.² The NCAA does not oppose this motion. In support thereof, Plaintiffs state as follows:

1. Pursuant to this Court's directions at the February 5, 2014 hearing and Case Management Order No. 1, and since Plaintiffs' first motion for extension of time, counsel for the Medical Monitoring Plaintiffs have been further engaged in conferring regarding, *inter alia*, the

¹ These cases are: *Adrian Arrington, et al. v. NCAA*, No. 1:11-cv-06356; *Walker, et al., v. NCAA*, No. 1:13-cv-09117; *Jerry Caldwell, et al., v. NCAA*, No. 1:14-cv-00195; *Stanley Doughty v. NCAA*, No. 1:14-cv-00199; *John Durocher, et al. v. NCAA, et al.*, No. 1:14-cv-00035; *Ray Hudson v. NCAA*, No. 1:14-cv-00194; *Paul Morgan, et al., v. NCAA*, No. 1:14-cv-00196; *Christopher M. Powell v. NCAA*, No. 1:14-cv-00198; *Chris John Walton, et al., v. NCAA*, No. 1:14-cv-00200; *Sharron D. Washington, et al., v. NCAA*, No. 1:14-cv-00197. Also, Plaintiffs in *Wolf v. NCAA*, No. 1:14-cv-01268, join in this motion.

² The Medical Monitoring Plaintiffs will make themselves available for a status conference in the interim, if the Court desires, on a mutually-convenient date.

status and substance of settlement negotiations between Interim Class Counsel in *Arrington* and the NCAA, including the scope of the medical monitoring program.

2. The work of the Medical Monitoring Plaintiffs has included consultations between their highly-qualified medical experts, who are working diligently but also have many other deadlines. As a result, the input of the medical experts has taken longer than we had hoped, but the delay could not be avoided.

3. The discussions among the Medical Monitoring Plaintiffs' counsel have been productive and may resolve issues regarding settlement and other topics. However, due to the complexity of the issues, all Medical Monitoring Plaintiffs believe an additional 45 days would aid in the resolution or narrowing of the current issues before the Court and be in the best interests of Plaintiffs and the Medical Monitoring Class Members.

4. Plaintiffs' counsel has conferred with the NCAA, and the NCAA agrees with Plaintiffs' request.

5. The extended dates agreed to by Medical Monitoring Plaintiffs' counsel and the NCAA, subject to the Court's approval, are as follows:

Description	Current Due Date	Requested Due Date
The <i>Arrington</i> Plaintiffs' response and the NCAA's response to the Motion To Temporarily Enjoin Settlement Negotiations	March 21, 2014	May 5, 2014
Applications for Lead and Liaison Counsel	March 26, 2014	May 9, 2014
The <i>Walker</i> Plaintiffs' Reply in Support of the Motion To Temporarily Enjoin Settlement Negotiations	March 28, 2014	May 12, 2014
Objections to Lead Applications	March 31, 2014	May 15, 2014
Proposed Case Management Schedule	March 31, 2014	May 15, 2014

Hearing	April 24, 2014	A new date for a hearing should be scheduled for date after May 20, 2014. ³
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WHEREFORE, the Medical Monitoring Plaintiffs respectfully request that the Court grant their Motion; extend the dates set forth in Case Management Order No. 1, as amended by this Court's February 20, 2014 Order, by 45 days; reset the hearing date to a date after May 20, 2014 at the Court's convenience; and grant such other and further relief as this Court deems appropriate.

Dated: March 20, 2014

Respectfully submitted,

ADRIAN ARRINGTON, DEREK OWENS,
ANGELICA PALACIOS, and KYLE
SOLOMON, individually and on behalf of
all others similarly situated

By: /s/ Elizabeth A. Fegan

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³ Counsel for the NCAA is not available May 15-19, 2014.

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CERTIFICATE OF SERVICE

I, Elizabeth A. Fegan, an attorney, certify that I filed the Second Agreed Motion for Extension of Time via the court's ECF system, which will serve all counsel of record in the above cases.

Dated: March 20, 2014

Respectfully submitted,

By: /s/ Elizabeth A. Fegan